Jonathan Grant
49 Meadow Ridge Rd.
Manchester Center, VT 05255 USA
December 14, 2018

The Honorable Ajit Pai, Chairman
The Honorable Michael O'Reilly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

Federal Communications Commission
455 12th Street SW
Washington, DC 20544 USA

RE: MB Docket No. 05-311

Dear Members of the Commission,

I am writing as a concerned citizen over the proposals and tentative conclusions contained in the FCC's September 25 Further Notice of Proposed Rule Making (FNPRM) in *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992*, MB Docket 05-311.

Section 611 of the 1984 Cable Act provides for local governments (in their role as a franchising authority) to require non-commercial, public interest access via Public, Educational, and Government (PEG) channels. Such access uses the commercial cable infrastructure that was being privately developed pursuant to the 1984 Cable Act. This provides mutual benefit where for-profit cable providers have access to local communities and customers, and in turn cable providers support their customer's communities with access and funds to utilize those same networks for the dissemination of non-commercial public programming and information. Cable infrastructure was intended as, and indeed has become, a nationwide communication infrastructure that is necessary for the public good, for free speech, and for our democracy.

My understanding of the recent FNPRM is that it will redefine the "franchising fee" in extremely broad terms to include "in-kind" support, essentially allowing the cable companies to use an accounting method which lets them establish a monetary value – without any guidance from the FCC on how such value is established – for access they provide to PEG channel operators.

This value is then deducted from the franchise fees which fund the PEG channels. In practice, this will allow for-profit cable companies to cancel out the fees that have historically funded public access television throughout the country, and shirk the intent of the 1984 Cable Act. It will gut the premise that cable company access is provided to local communities and in exchange these communities are provided both a means (the cable communications infrastructure) and funds (franchise fees) to facilitate PEG channels for local, non-profit communication.

As a resident in a community with only one cable supplier, my experience is the cable supplier will take maximum advantage of any opportunity to increase profit at the expense of an individual consumer or the public good. Most for-profit companies will minimally support actions for public good at the expense of profit without a mandate. Such a mandate was made possible by the 1984 Cable Act through the powers and franchising fees given to the franchising authority. Here in Vermont we have some very active community groups that take advantage of the local cable networks. Contrasting opinions are aired, and independent journalism documents both local and statewide issues. We can watch candidate debates that may occur at the other end of the state. The implication in the FNPRM that franchise fees benefit only or a third party PEG provider could not be further from the truth.

The likely consequence of implementing the FNPRM is the elimination of funding for local public access television – the ability to watch town meetings, candidate interviews, local interest programming, and the opportunity to train local youth (and others) in audio-video and broadcast technology. I strongly urge you to reconsider these potential adverse consequences of the FNPRM, how it undermines the original intent and pubic good provided by the 1984 Cable Act, and how important PEG channels are to a free and open democracy that remains independent of profit motives. I cannot support and hope you will not implement the FNPRM as currently written.

Respectfully,

Digitally signed by Jonathan F Grant:A0109800000015DECF346CA00002F54
Date: 2018.12.14 20:40:37 -05'00'

Jonathan F. Grant